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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

| | | |
|----------------------------------|---|--|
| HELEN A. MANNEH, |) | Case No: 2:15-cv-02200-RFB-PAL |
| |) | |
| Plaintiff |) | |
| |) | |
| v. |) | JOINT STIPULATION FOR EXTENSION |
| |) | OF TIME TO FILE DEFENDANT'S |
| |) | CROSS-MOTION TO AFFIRM OR |
| CAROLYN W. COLVIN, Acting |) | NOTICE OF VOLUNTARY REMAND OF |
| Commissioner of Social Security, |) | THE CASE |
| |) | |
| Defendant. |) | (First Request) |
| |) | |

1 Plaintiff Helen A. Manneh (Plaintiff) and Defendant Carolyn W. Colvin, Acting
2 Commissioner of Social Security (the Commissioner), stipulate, with the approval of this Court,
3 to an extension of time to file Defendant's Cross-Motion To Affirm or Notice Of Voluntary
4 Remand Of The Case by thirty days from August 31, 2016 to September 30, 2016, with all other
5 dates in this Court's Scheduling Order extended accordingly. This is the Commissioner's first
6 request for an extension.

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15 There is good cause because, since Plaintiff filed her Motion For Reversal And/Or
16 Remand, counsel has been handling a large number of District Court and Ninth Circuit cases in
17 addition to this one, with fourteen briefs due within the next twenty-six days. Additionally, the
18 Commissioner's counsel has had numerous other deadlines, including a District Court brief filed
19 today, a Ninth Circuit brief filed on August 26, 2016, as well as several conferences in an
20 employment case, a settlement memorandum, and multiple mentoring and reviewing duties in
21 the Office of the General Counsel. Counsel was also out of the office on leave for five days and
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1 has been intermittently absent due to illness. As result, the Commissioner needs additional time
2 to properly respond to the issues Plaintiff raised in her Motion. Plaintiff has no objection.

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4 Respectfully submitted,

5 Date: August 31, 2016

6 By: /s/* Marc V. Kalagian
7 MARC V. KALAGIAN
8 Attorney at Law
9 *by email authorization on 8/31/16

10 Attorneys for Plaintiff

11 Date: August 31, 2016

12 DANIEL G. BOGDEN
13 United States Attorney
14 BLAINE T. WELSH
15 Chief, Civil Division

16 By: /s/ April A. Alongi
17 APRIL A. ALONGI
18 Special Assistant United States Attorney

19 Attorneys for Defendant

20 IT IS SO ORDERED.

21
22
23 DATE: September 6, 2016

24 
25 THE HONORABLE PEGGY A. LEEN
26 United States Magistrate Judge

DEFENDANT'S CERTIFICATE OF SERVICE

I certify that I caused a copy of the Joint Stipulation For Extension Of Time To File Defendant's Cross-Motion To Affirm Or Notice Of Voluntary Remand Of The Case (First Request) to be served, via CM/ECF notice, on:

MARC V. KALAGIAN, SBN 4460
Attorney at Law
marc.kalagian@rksslaw.com

Date: August 31, 2016

DANIEL G. BOGDEN
United States Attorney
BLAINE T. WELSH
Chief, Civil Division

By: /s/ April A. Alongi
APRIL A. ALONGI
Special Assistant United States Attorney

Attorneys for Defendant